

UNITED STATES OF AMERICA  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA

v.

SANTIAGO ET AL.

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**DEFENDANT'S MOTION TO ENLARGE THE TIME TO FILE THE DISCOVERY  
LETTERS [ASSENTED]**

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Now come the undersigned defendants and move this Honorable Court, pursuant to F.R.A.P. Rule 26 to enlarge the time to file their discovery letters through March 4, 2005. The logistics of filing one letter for all defendants requires some additional time.

The government has assented to this motion. Her time to respond to our letter should be likewise enlarged. All parties agree that this additional time should be excluded, pursuant to the Speedy Trial Act, in the interests of justice.

WHEREFORE, the parties pray that this Court grant the enlargement.

Respectfully submitted,  
JOSE TORRADO  
By his attorney,

/s/ Lenore Glaser  
Lenore Glaser, Esq.  
25 Kingston Street  
6th Floor  
Boston, MA 02111  
(617) 753-9988  
BBO #: 194220

For the government,

/s/ Denise J. Caspar  
Denise J. Caspar, Esq.  
United States Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3120

By his attorney,  
ENRIQUE AGOSTO

/s/ Catherine Byrne  
Catherine Byrne, Esq.  
Federal Defender's Office  
408 Atlantic Avenue, 3<sup>rd</sup> Floor  
Boston, MA 02210  
(617) 223-8061

By his attorney,  
PEDRO ABLERTO MIRANDA

/s/ John F. Palmer  
John F. Palmer, Esq.  
24 School Street  
8<sup>th</sup> Floor  
Boston, MA 02108  
(617) 723-7010

By his attorney,  
CARLOS SANCHEZ

/s/ Anthony J. Scola  
Anthony J. Scola  
47 Harvard Street  
Worcester, MA 01608  
(508) 755-6314

Dated: February 18, 2005

Attorney John F. Cicilline for Julio Carrion Santiago; Attorney Carl N. Donaldson for Reynaldo Rivera; Attorney Valerie Carter for Jose Rodriguez; Attorney Robert M. Goldstein for Luis F. Sanchez; Attorney Victoria M. Bonilla-Argudo for Edwin Torrez and Attorney Roger Witkin for Zuleima Reyes were contacted but have not yet responded.

**Certificate of Service**

Attorney John D. Hodges, Jr. and Attorney Anthony J. Scola who do not have email were notified telephonically and sent a copy by prepaid first class mail on February 18, 2005.